

Hearing Date and Time: October 17, 2023 at 10:00 a.m.
Objection Deadline: October 10, 2023 at 4:00 p.m.

RUBIN LLC
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Co-counsel for Felix Street Holdings LLC

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK

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In re: : Chapter 11
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HYACINTH JOYCE SIMMS, : Case No.: 23-40070-NHL
:
Debtor. :
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AMENDED NOTICE OF AMENDED MOTION OF FELIX STREET
HOLDINGS LLC FOR ENTRY OF AN ORDER GRANTING RELIEF
FROM THE AUTOMATIC STAY AND RELATED *IN REM* RELIEF

PLEASE TAKE NOTICE that a hearing (the “Hearing”) to consider the motion (the “Motion”) [ECF No. 42] of Felix Street Holdings LLC (the “Secured Creditor”), by and through its undersigned counsel, for entry of an order: (i) granting the Secured Creditor relief from the automatic stay pursuant to sections 362(d)(1) and (d)(2) of title 11 of the United States Code (the “Bankruptcy Code”) to permit the Secured Creditor to exercise its rights and remedies (including conducting and consummating the foreclosure sale) with respect to the real property located at 1478 Flatbush Avenue, Brooklyn, New York (Block 5249, Lot 68) (the “Flatbush Property”) owned by Hyacinth Joyce Simms (the “Debtor”); (ii) granting the Secured Creditor relief from the automatic stay, *in rem*, pursuant to section 362(d)(4) of the Bankruptcy Code; and (iii) waiving the 14-day stay of the effectiveness of the order granting the Motion pursuant to Rule 4001(a)(3)

of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) shall be held before the Honorable Nancy Hershey Lord, United States Bankruptcy Judge, at the United States Bankruptcy Court, on **October 17, 2023 at 10:00 a.m.** or as soon thereafter as counsel can be heard.

PLEASE TAKE FURTHER NOTICE that objections to the Motion, if any, must be in writing, shall conform to the Bankruptcy Rules and the Local Rules of the Bankruptcy Court, shall be filed with the Bankruptcy Court, and shall be served upon (a) counsel for the Secured Creditor, Rubin LLC, 11 Broadway, Suite 715, New York, NY 10004 (Attn.: Paul A. Rubin); and (b) all parties who have timely filed requests for notice under Rule 2002 of the Bankruptcy Rules, so as to be received no later than **October 10, 2023 at 4:00 p.m.** (the “Objection Deadline”).

PLEASE TAKE FURTHER NOTICE that the Bankruptcy Court conducts hearings telephonically and by videoconference. All participants must register with eCourt Appearances in advance of all telephonic and videoconference appearances. eCourt Appearances registration is required by both attorneys and non-attorney participants. Attorneys with a CM/ECF account may find the program under the “Utilities” menu after logging on to CM/ECF. Those without CM/ECF accounts may access the program on the website at <https://ecf.nyeb.uscourts.gov/cgi-bin/nyebAppearances.pl>. Once registered, eCourt Appearances will email the telephone number and/or video link for your hearing. You may register for hearings weeks in advance, but the telephone number and/or video link will not be emailed to you until 48 hours before the hearing date. Those registering with eCourt Appearances for hearings in less than 48 hours should allow up to 15 minutes after registration to receive the email with the telephone number and/or video link. Those unable to access eCourt Appearances must email Judge Nancy Hershey-Lord’s Courtroom Deputy at: nhl_hearings@nyeb.uscourts.gov at least two (2) business days prior to the

hearing. Your email must include your name, the case number(s), who you represent (if you are an attorney), hearing date, and phone number.

Chapter 11 Matters and Related Adversary Proceedings - Beginning June 7, 2022, hearings on all Chapter 11 cases and their related adversary proceedings will be conducted using the Zoom platform. Parties have the option to either dial in as an audio only participant using the provided Zoom dial-in number or connect by video using the provided video link.

Dated: New York, New York
September 27, 2023

RUBIN LLC

By: /s/ Paul A. Rubin
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